

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUNIOR A. ANDERSON,

Defendant.

Case No.

**25-CR-045**

[18 U.S.C. §§ 922(g)(1), 924(a)(8),  
& 2(a)]

**Green Bay Division**

**INDICTMENT**

**COUNT ONE**

**(Possession of firearms by a convicted felon)**

**THE GRAND JURY CHARGES THAT:**

1. On or about November 6, 2023, in the State and Eastern District of Wisconsin,

**JUNIOR A. ANDERSON,**

knowing that he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed firearms which, prior to his possession of them, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearms are more fully described as (i) a 9mm pistol with no serial number and marked with "PF9406C Polymer80, Inc. Made in USA Dayton, NV"; and (ii) a Browning 9mm pistol bearing serial number 245NZ52041.

All in violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(8), and 2(a).

**COUNT TWO**  
**(Possession of a firearm by a convicted felon)**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about December 18, 2023, in the State and Eastern District of Wisconsin,

**JUNIOR A. ANDERSON,**

knowing that he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearm is more fully described as a 9mm pistol with no serial number and marked with “PF9406C Polymer80, Inc. Made in USA Dayton, NV.”

All in violation of Title 18, United States Code, Sections 922(g)(1), 924(a)(8), and 2(a).

### NOTICE OF FORFEITURE


Upon conviction of Counts One or Two of this indictment, the defendant shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms involved in the offenses, including:

- a. a 9mm pistol with no serial number and marked with "PF9406C Polymer80, Inc. Made in USA Dayton, NV";
- b. a Browning 9mm pistol bearing serial number 245NZ52041; and
- c. a 9mm pistol with no serial number and marked with "PF9406C Polymer80, Inc. Made in USA Dayton, NV."

A TRUE BILL:

FOREPERSON

Dated: 11 MAR 2025

  
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RICHARD G. FROHLING  
Acting United States Attorney